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NAS CECIL FIELD
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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING DRAFT REMEDIAL INVESTIGATION OPERABLE UNIT 8 (OU8)
SITE 3 NAS CECIL FIELD FL
6/28/1995
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Lawton Chiles
Governor

Department of Environmental Protection

Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

June 28, 1995

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Commanding Officer
Mr. Alan Shoultz, Code 1875
SOUTHNAVFACENGCOM
Post Office Box 190010
North Charleston, SC 29419-0068

RE: Draft Remedial Investigation, Operable Unit 8, Site 3,
Naval Air Station Cecil Field Florida.

Dear Mr. Shoultz:

I have completed the technical review of the Draft Remedial Investigation, dated April 1995 (received May 4, 1995) submitted for the above-referenced facility. Before this document is considered Final the following comments need to be addressed:

1. Figure 1-3, this figure should include the location of the Lake Fretwell access road.
2. Page 2-8, Section 2.4.2, the rationale for the location of confirmatory surface and subsurface soil locations should be presented within the main portion of this report, instead of "Appendix A". Furthermore, this rationale is actually contained in Appendix B and not in "Appendix A".
3. Page 2-11, Section 2.5.1, the rationale for the location of the confirmatory monitoring wells should be presented within the main portion of this report, instead of Appendix B.
4. Table 2-1, add a column that indicates the monitoring wells' screened interval.
5. Figure 3-5, this figure would be enhanced by an insert map showing the location of the monitoring wells depicted on the fence diagram.
6. Figures 3-6 and 3-8, these figures would be enhanced by an insert map showing the location of the monitoring wells depicted on Lithologic Cross Section A-A'.

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7. Page 4-2, is the average of a sample and its duplicate consistent with EPA RAGS? In the Petroleum Contaminated Site Program the higher of the two samples is used.
8. Page 4-4, Section 4.2.1.1, figures depicting the field screening results should be contained in this section instead of "Appendix D". Furthermore, these figures are actually contained in Appendix B.
9. Tables 4-1, 4-2, 4-3, and 4-4, although the analytes that represent human health contaminants of potential concern (HHCPs) are shaded, this table would be enhanced if a column were added that included the analytes soil cleanup goal listed in *Florida Soil Cleanup Goals for Military Sites*, dated April 5, 1995. This enables the reader to determine the magnitude of an exceedance.
10. Figures 4-1, 4-2, 4-3, 4-5, 4-6, 4-11, 4-12, 4-13, and 4-14, the units of measurement for the listed analyte detections should be included on these figures.
11. Tables 4-5, 4-6, 4-7 and 4-8, although the analytes that represent human health contaminants of potential concern (HHCPs) are shaded, these tables would be enhanced if a column were added that included the Florida Groundwater Guidance Concentrations, Surface Water Standards, and Sediment Screening Guidelines for the listed analytes. This enables the reader to determine the magnitude of an exceedance.
12. Figure 4-7, the 100 ppb 1,1 dichloroethane isoconcentration contour should be changed to include the 280 ppb detection in monitoring well CEF-3-7S.
13. Page 5-9, Section 5.2.3.2, the State of Florida requires that contaminants in groundwater meet surface water standards prior to mixing with the surface water. That is, dilution of contaminated groundwater in the surface water body is not permitted in achieving surface water standards. Compliance must be assessed through groundwater measurements, ideally as close as possible to the point of contact between groundwater and surface water. Therefore, surface water compliance should be achieved at monitoring well CEF-3-31S.
14. Page 6-6, Section 6.3.5, surface soil (0 to 1 feet) and the one to two feet below land surface soil interval should be

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compared to the *Florida Soil Cleanup Goals for Military Sites*, dated April 5, 1995.

15. Page 6-19, Section 6.4.5, sediment detections should also be screened against FDEP Sediment Quality Assessment Guidelines contained in *Approach to the Assessment of Sediment Quality in Florida Coastal Waters*, dated November 1994.
16. Appendix B, see comments 2 and 3.
17. Appendix I, the screened intervals for the monitoring wells at the Truck Stand, North Fuel Farm, and South Fuel Farm should be added to this table.
18. Appendix O, Tables O-1 through O-7, these tables should be incorporated into Sections 4 and 6.

If you have any concerns regarding this letter, please contact me at (904) 921-9991.

Sincerely,



Michael J. Deliz, P.G.
Remedial Project Manager

CC: John Mitchell, FDEP Natural Resource Trustee
Satish Kastury, FDEP
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TJB ~~by ESN~~ JCC ~~by ESN~~ ESN ESN